David H. Griggs, OSB No. 982436

e-mail: david@griggslawpc.com GRIGGS LAW GROUP P.C. 4900 SW Griffith Dr., Ste. 165

Beaverton, OR 97005 Telephone: (971) 228-8110

Fax: (971) 327-6735

Attorneys for Plaintiff

UNITED STATES DISTRICT COURT FOR THE DISTRICT OF OREGON

PORTLAND DIVISION

ANDREA OLSON, an individual	 Case No.: 3:15-cv-02216-HZ DECLARATION OF DAVID H. GRIGGS IN SUPPORT OF PLAINTIFF'S SECOND UNOPPOSED MOTION FOR EXTENSION OF TIME TO RESPOND TO FEDERAL
Plaintiff,	
v.	
UNITED STATES OF AMERICA, by	DEFENDANTS' MOTION FOR SUMMARYJUDGMENT
and through the Department of Energy and Bonneville Power Administration;)
and JAMES RICHARD PERRY,	,
Secretary of the Department of Energy,))
Defendants.)

- I, David H. Griggs, do declare and say:
- 1. I am one of the attorneys for Plaintiff in the above-mentioned matter.
- I have prepared this declaration in support of Plaintiff's Second Unopposed Motion for Extension of Time to Respond to Federal Defendants' Motion for Summary Judgment.

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1 – DECLARATION OF DAVID H. GRIGGS IN SUPPORT OF PLAINTIFF'S SECOND UNOPPOSED MOTION FOR EXTENSION OF TIME TO RESPOND TO FEDERAL DEFENDANTS' MOTION FOR SUMMARY JUDGMENT

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- Defendant hereby requests an order allowing a 10-day extension of time from
 February 2, 2018, up to and including February 12, 2018, to file Plaintiff's Response to
 Federal Defendants' Motion for Summary Judgment.
- 4. Plaintiff seeks this extension of time for the following reasons:
- (a) Plaintiff filed a Motion for Extension of Time and Motion for Appointment of Counsel with the court on December 1, 2017.
- (b) Defendant filed a Motion for Summary Judgment with the Court on December 4, 2017. On that date the Court issued an Order granting Plaintiff's Motion for Extension of Time and denying Plaintiff's Motion for Appointment of Counsel. Also on that date, the court set the deadline for Plaintiff's Response to Defendants' Motion for Summary Judgment to January 3, 2018.
 - (c) Plaintiff retained me as counsel on December 22, 2017.
- (d) The same day, December 22, 2017, I conferred with counsel for Federal Defendants, James Cox, requesting 30 additional days to respond to Federal Defendants' Motion for Summary Judgment. Mr. Cox agreed to the request.
- (e) On December 26, 2017, I filed a Notice of Appearance of Counsel for Plaintiff in this case and also filed an Unopposed Motion for Extension of Time to Respond to Federal Defendants' Motion for Summary Judgment.
- (f) On December 30, 2017, the Court issued an Order granting Plaintiff's Motion for Extension of Time and set the deadline for Plaintiff's Response to Defendants' Motion for Summary Judgment to February 2, 2018.
- (g) We have been gathering the materials for this matter since our initial engagement and the volume of documents relevant to it is extensive. We have been diligently working on
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become familiar with the facts of the case, and preparing the response, but are concerned that we do not have time to prepare an adequate response in time by February 2, 2018. Therefore, we are requesting an extra ten days, to February 12, 2018. We will not seek another extension of time.

(h) On January 18, 2018, I conferred with counsel for Federal Defendants, JamesCox, requesting 10 additional days to respond to Federal Defendants' Motion for SummaryJudgment. Mr. Cox agreed to the request.

DATED this 19th day of January, 2018.

GRIGGS LAW GROUP, P.C.

By: /s/David H. Griggs

David H. Griggs, OSB No. 982436 e-mail: david@griggslawpc.com 4900 SW Griffith Dr., Ste. 165

Beaverton, OR 97005 Telephone: (971) 228-8110

Fax: (971) 327-6735

Trial Attorney: David H. Griggs